

# What must a CPDS contain?

A certified product data sheet (CPDS) is documentation furnished by coating or adhesive suppliers or an outside laboratory. The purpose of the CPDS is to assist you in demonstrating compliance with the emission limits. The CPDS must provide the following information:

1. The **VHAP content** of a finishing material, contact adhesive, or solvent by percent weight.  
The VHAP content should be represented to the nearest 1.0% by weight or 0.1% for carcinogens. Only VHAP present in concentrations greater than or equal to 1.0% by weight or 0.1% for VHAP that are carcinogens must be reported on the CPDS. (The supplier/laboratory must use EPA Method 311 or an equivalent method to determine HAP content)
2. The **solids content** of a finishing material or contact adhesive by percent weight.  
(The supplier/laboratory must use EPA Method 24 or an equivalent method to determine solids content)
3. The **density** of a finishing material or contact adhesive.  
(The supplier/laboratory must use EPA Method 24 or an equivalent method to determine density)

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## XYZ Coatings, Inc.

### Certified Product Data Sheet

**Material Manufacturer:** Silly, Inc.

**Customer:** ABC Kitchen Cabinets  
100 N. Wood Ave.  
Finishing, IN 46000

**Product:** Amazing Coating AC-123

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<b>Product density:</b>	7.55 pounds/gallon	<b>Test Method:</b>	Method 24
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<b>Total solids:</b>	10.11 % by weight	<b>Test Method:</b>	Method 24
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<b>VOC content:</b>	0.1 % by weight	<b>Test Method:</b>	Method 24
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<b>VHAP content:</b>	0.09 % by weight	<b>Test Method:</b>	Method 311
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<b>CAS Number</b>	<b>Chemical name</b>	<b>% Weight</b>
68122	Dimethyl formamide	0.09

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# Questions and Answers regarding CPDS

The statements in this factsheet are intended solely as guidance. This factsheet is not intended, nor can it be relied upon, to create any rights enforceable by any party in litigation with the Indiana Department of Environmental Management. Wood furniture manufacturers should refer to 40 CFR part 63, subpart JJ and the Federal Register that will list any proposed and/or final amendments to subpart JJ for applicable requirements.

**A. Where in the NESHAP does it require suppliers to certify the VHAP contents of their materials?**

*The suppliers are not regulated by this standard, the manufacturers are. It is required for the manufacturer to have certified product data sheets (CPDS). Therefore, it is the responsibility of the manufacturer to get all necessary CPDS from its supplier.*

**B. Does a CPDS have to be signed or initialed?**

*No, the CPDS does not need to be signed or initialized. As long as the documentation furnished by the coating supplier meets the definition and provides the required information on a CPDS, this will suffice. The required information includes the HAP content of the finishing material, contact adhesive, or solvent by percent weight; the solids content of a finishing material or contact adhesive by percent weight; and the density.*

**C. When does a supplier have to furnish a new CPDS to replace an existing one? (Indiana)**

*CPDSs must be maintained for each finishing material (stains, washcoats, sealers, topcoats, basecoats, enamels, thinners), contact adhesive, and solvent. If a supplier changes the formulation of the coating so the HAPs content stated on the existing CPDS does not match the new formulation within the detection requirements (i.e., 1% for solvents and 0.1% for HAPs that are carcinogens), then a new CPDS is required.*

**D. If a facility is distilling solvents for reuse, are lab tests and new CPDSs required for every batch out of a still?**

*If the distilled solvent is being used in cleaning and washoff, then the original MSDS for the original solvent must be kept and MSDS sheets of all products that may be found in the solvent must also be kept. (Indiana)*

*If the facility is distilling solvents for reuse as thinners in coatings, then the distilled solvent should still be compliant if only compliant materials were distilled. The source should verify this by conducting at least some tests on their distilled solvents.*

**E. Does a nonregulated coating need a CPDS? (Indiana)**

*If the HAPs content is less than 0.5% (0.05% for carcinogenic), it is not reportable and does not need a CPDS. Otherwise, it may be necessary to obtain a CPDS, especially if this material is being mixed with others and there is a possibility of increasing the HAPs content over the NESHAP limits. CPDSs will also be necessary when using the averaging approach for compliance which takes into account all finishing material.*

**F. Can the CPDS simply state that the HAP content of the product satisfies the NESHAP requirements of 1.0%? (Ex. <1.0%)**

*The VHAP content should be represented to the nearest 1.0% by weight or 0.1% for carcinogens.*